

Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 23-61703-CIV-SINGHAL/VALLE

CHG MEDICAL STAFFING, INC.
d/b/a RNNETWORK a Delaware
Corporation,

Plaintiffs,

v.

RACHEL SHAFFER, an individual,
LISLEY ROSSI, an individual,
AHS STAFFING, LLC, an Oklahoma Limited
Liability Company,

Defendants. _____ /

DECLARATION OF MARC HESTER

Pursuant to 28 U.S.C. § 1746 and under penalty of perjury, I, Marc Hester, declare that the following is true and correct:

1. I am over 18 years of age and otherwise competent to testify to the matters set forth in this Declaration, which are based on my personal knowledge.
2. I have been employed as a recruiter at AHS Staffing, LLC (“AHS”) since on or about March 6, 2023.
3. I have been on approved medical leave from AHS since August of 2023 due to a serious heart condition – low ejection fraction. Due to my ejection fraction, limited oxygen is supplied to my body, which causes me gaps in memory, mental confusion, neuropathy, and edema, among other symptoms. Until recently, I have also been on a medicine regimen of narcotic pain relievers, sedatives, and other medication.
4. On November 3, 2023, I was served with a subpoena issued by Shlomo Y. Hecht,



attorney for Rachel Shafer, while at my home, located at 1469 Craig Ct, Port Orange, FL 32129.

My home is approximately 233 miles (by car) from the courthouse referenced in the subpoena.

5. Due to my condition and medical appointment, I will not be able to attend the hearing and testifying at a hearing in person would cause me an undue burden. I have on-going appointments with several medical providers to treat my condition, including an appointment scheduled for November 7, 2023, that conflicts with the time of the hearing as stated in the subpoena. Because of my condition, I must adhere to strict physical limitations and am unable to travel from my home to the courthouse mentioned in the subpoena without approval from my treating physician.

6. I have reviewed the allegations in Plaintiff's Petition regarding an anonymous phone call made from an employee of AHS to Plaintiff. I understand that Plaintiff has also presented evidence that suggested the person who made that phone call identified themselves as Marc Hester.

7. I have no recollection of making that phone call, and I do not know about Rachel Shafer's activities while she was employed at AHS. I know that she was a fellow recruiter at AHS, but I do not know anything about her candidates, submissions, or placements, or information that she may have uploaded into AHS's system.

8. Since I do not have information regarding Rachel Shafer's activities while she was employed at AHS and have no recollection of making that phone call, I do not have any documents to produce in response to the subpoena.

9. Pursuant To 28 U.S.C. § 1746, I verify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED ON November 6, 2023





A handwritten signature in black ink, appearing to read "M Hester". The signature is written in a cursive style with a horizontal line underneath it.

MARC HESTER



A handwritten oval containing the initials "M.H." in black ink.